

These comments are filled in support of establishing a Rural Translator Service proposed by the National Translator association.

Re: "Technical Limitations" on pages 16 & 17 of NTA's proposal

We agree with the ERP limits, but do not see value in limiting transmitter power. Proper engineering should determine transmitter power for the given application.

Input to the translator should be allowed from the primary station via satellite. We think that the NTA's desire to keep this a "local" service would be better served if a qualifying primary station would be required to meet one of the following conditions: #1 Be within the same Television Market or DMA, or #2 Be within the same state, or #3 Be within 200 miles.

Re: "Modifications" page 17

We believe it would be counter productive to the service proposed if in any way it could be used a stepping stone to higher power, or to an LPTV service. People should not be allowed to use the Rural Translator Service as a means to "warehouse" channels for future projects.

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